

Exhibit 66

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK, et al.

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official capacity as
SECRETARY OF THE U.S. DEPARTMENT OF
HEALTH AND HUMAN SERVICES, et al.,

Defendants.

Case No. 25-cv-00196

DECLARATION OF ANNICK BENSON-SCOTT

I, Annick Benson-Scott, declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct:

1. I am the HIV/STD/TB Section Manager for the Center for Public Health Practice, Public Health Division of the Oregon Health Authority (OHA). I am familiar with the information in the statements set forth below either through personal knowledge, in consultation with staff and subject matter experts within OHA, or from documents that have been provided to and reviewed by me.

2. I submit this Declaration in support of the States' Reply in Support of Motion for a Preliminary Injunction.

Professional Background

3. I have been employed in public health program development, education, administration, and policy implementation in Oregon since 2000. I have been the OHA HIV/STD/TB Section Manager since 2016. My prior responsibilities include HIV/TB

Community Services Manager between 2005-2016 and Public Health Program Coordinator between 2000-2005.

4. The Center for Public Health Practice within the Oregon Health Authority Public Health Division includes several joint research projects that rely not just on federal funds but on program oversight by federal project officers, operational training, and collaboration between field sites in other states that the federal program officers fund and facilitate. The methodological and scientific integrity of these projects depends on continuity of the research. The research itself serves to inform public health initiatives in Oregon and nationally.

5. The OHA HIV/STD/TB Section is responsible for conducting two such projects. Both projects are managed by the Centers for Disease Control and Prevention (CDC), Division of HIV Prevention, Behavioral and Clinical Surveillance Branch of the National Center for HIV, Viral Hepatitis, STD and Tuberculosis Prevention within the Federal Department of Health and Human Services (HHS). These projects provide the State of Oregon with up-to-date information about health care need and utilization, access and quality of care, effectiveness of prevention messages, and specific communities of people at risk for HIV transmission or about people living with HIV. The information collected from these projects help Oregon providers plan and implement HIV prevention and care services to prevent HIV transmission and improve health outcomes.

6. The OHA HIV/STD/TB Section has been administering the Medical Monitoring Project (MMP) survey in Oregon since 2007. MMP data are the primary means of collecting needs assessment data related to people living with HIV in Oregon. Through MMP data, we better understand how people with HIV in Oregon are doing clinically, behaviorally, and socially. We can examine a wide variety of factors by geographic area and patient characteristics,

and adjust HIV care and prevention services, as needed, to ensure equitable access to health care and other supportive services for all Oregonians living with HIV.

7. On January 1, 2025, OHA responded to Notice of Funding Opportunity PS25-0008 requesting funds to continue the MMP project. On April 1, 2025, the OHA project contact received an email from the CDC project officer that their position and unit was eliminated. On April 14, 2025, OHA received an email from MMP@cdc.gov that all meetings were cancelled. To date, CDC has provided no information to OHA regarding the status of the grant application submitted. The current grant ends May 31, 2025.

8. OHA has three full time staff working as Data Collection Specialists in MMP. The next grant payment is due on June 1, 2025, and if CDC personnel are no longer in place to administer the grant, the loss of funding may require OHA to eliminate these public health positions.

9. The OHA HIV/STD/TB Section has been administering the National HIV Behavioral Surveillance (NHBS) project survey in Oregon since 2016. NHBS data is the primary means of collecting needs assessment data related to people at risk for acquiring HIV. Through NHBS data, we better understand behavioral risk factors for HIV, HIV testing behaviors, receipt of prevention services, and use of prevention strategies for community members disproportionately affected by HIV. Medical and public health scientists use NHBS data to evaluate and develop behavioral health treatment and intervention that reduces spread of HIV and increases effectiveness of disease management.

10. On April 1, 2025, the OHA project contact received a text from the CDC project officer stating that the branch was eliminated and the entire NHBS staff were laid off. On May 9, 2025, the OHA project contact received a notice from CDC stating “all NHBS meetings—both

virtual and in-person—are cancelled”. This includes in person Field Operations Training previously planned for May 2025.

11. OHA has a contract with Portland State University to administer NHBS. The current grant ends December 31, 2025. OHA and the contractor have no information pertaining to the continuation of this project. If CDC personnel are no longer in place to administer the grant, the loss of funding will require OHA to terminate this contract.

12. Each of the above-described projects affect Oregonians, as the loss of information pertaining to persons at risk for, or affected by HIV can have detrimental consequences, including a potential for outbreaks and increase in new infections and preventable deaths. In addition, the loss of these projects further reduces public health scientific expertise, hindering progress in understanding how to develop prevention programs that work and what services people need to thrive. Reestablishing these research programs after they have been dismantled would be costly, as the capacity that has been built will have been lost or greatly diminished

A handwritten signature in black ink, appearing to read 'C B - S', with a horizontal line extending to the right.

Annick Benson-Scott

Date: 5/15/2025